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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(San Francisco Division)

SOLANO & NAPA COUNTIES
ELECTRICAL WORKERS HEALTH &
WELFARE TRUST; et al.,

Plaintiffs,

vs.

CAMERON ELECTRIC & LIGHTING
DESIGN, a sole proprietorship; et al.,

Defendants.

Case No. C-07-4111 VRW

**REQUEST TO ENTER DEFAULT
AGAINST DEFENDANTS ZACHARY
ALAN CAMERON & CAMERON
ELECTRIC & LIGHTING DESIGN**

[F.R.C.P. Rule 55(a)]

TO: THE CLERK OF THE ABOVE-ENTITLED COURT

Plaintiffs SOLANO & NAPA COUNTIES ELECTRICAL WORKERS HEALTH & WELFARE
TRUST; SOLANO & NAPA COUNTIES ELECTRICAL WORKERS LABOR &
MANAGEMENT COMMITTEE; I.B.E.W. LOCAL 180 JOINT APPRENTICESHIP TRAINING
TRUST FUND; SOLANO AND NAPA COUNTIES ELECTRICAL WORKERS PENSION
TRUST FUND; SOLANO & NAPA COUNTIES ELECTRICAL WORKERS PROFIT
SHARING PLAN; LOCAL 180 of the INTERNATIONAL BROTHERHOOD OF ELECTRICAL
WORKERS, AFL-CIO; and, DAN BROADWATER, as Trustee of the Plaintiff Trusts and Co-

1 chair of the Committee, hereby request that the Clerk of the above-entitled Court enter default in
2 this matter against Defendant ZACHARY ALAN CAMERON and Defendant CAMERON
3 ELECTRIC & LIGHTING DESIGN, on the ground that said Defendants have failed to appear or
4 otherwise respond to the Summons and Complaint within the time prescribed by the Federal Rules
5 of Civil Procedure.

6
7 Plaintiffs served the Summons and Complaint on Defendant ZACHARY ALAN
8 CAMERON on August 21, 2007 as evidenced by the Proofs of Service of Summons and
9 Complaint filed with this Court.

10 Plaintiffs served the Summons and Complaint on Defendant CAMERON ELECTRIC &
11 LIGHTING DESIGN on August 21, 2007 as evidenced by the Proofs of Service of Summons and
12 Complaint filed with this Court.

13
14 The above-stated facts are set forth in the accompanying Declaration of Scott M. De Nardo,
15 filed herewith.

16 Respectfully Submitted,

17
18 Dated: 9/12/2007

19 NEYHART, ANDERSON, FLYNN & GROSBOLL

20 By: 

21 SCOTT M. De NARDO
22 Attorneys for Plaintiffs
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PROOF OF SERVICE BY MAIL

I, the undersigned, declare:

I am employed in the City and County of San Francisco, State of California. I am over the age of 18 years and not a party to the within action; my business address is 44 Montgomery Street, Suite 2080, San Francisco, California 94104. On September 12, 2007, I served the within:

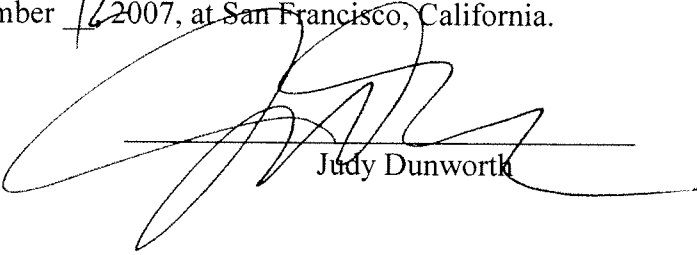
REQUEST TO ENTER DEFAULT AGAINST DEFENDANTS ZACHARY ALAN CAMERON & CAMERON ELECTRIC & LIGHTING DESIGN

on the parties in said cause following our business practice, with which I am readily familiar. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I placed a true copy of the within document enclosed in a sealed envelope with first class postage thereon fully prepaid for collection and deposit on the date shown below in the United States mail at San Francisco, California addressed as follows:

ZACHARY ALAN CAMERON
2412 3rd Street
Napa, CA 94559

CAMERON ELECTRIC & LIGHTING DESIGN
2412 3rd Street
Napa, CA 94559

I declare under the penalty of perjury that the foregoing is true and correct, and that this declaration was executed on September 12, 2007, at San Francisco, California.


Judy Dunworth